

October 26 2021

Rodney Smolden, Forest Supervisor

Colville National Forest

765 South Main Street

Colville, WA 99114



Dear Mr. Smolden,

On behalf of The Lands Council, thank you for the opportunity to comment on the proposed land exchange between the Stimson Lumber Company and the USFS. The Lands Council is supportive of reducing the checkerboard pattern of land ownership and gaining critical habitat under the stewardship of the USFS, particularly in the Little Pend Oreille National Wildlife Refuge and within the LeClerc watershed. However, we have concerns related to this scope and information available about this exchange.

The land appraisal process, as to our understanding, does not take into account many ecological, restoration, and maintenance costs. A goal of The Lands Council is to reduce the number of roads within the Colville National Forest (CNF). This land exchange would add 530 miles of new roads. Although the CNF plans further analysis of these road systems, the cost to maintaining and decommissioning these roads is not addressed in the appraisal process. How will the CNF account for cost sharing with Stimson of over 300 miles of forest service roads?

The proposed exchange includes critical area habitat mapped for several threatened species. Has there been any assessment of the ecological status of these habitats currently under Stimson management? There will be cost for restoration in many of these critical areas, particularly if these parcels have been recently harvested or harvested before appropriate riparian setbacks were in place. These actions reduce their ecological value for 10s to over one hundred years.

Intensively harvested units have a high likelihood of invasive weeds and recent harvest can have lingering residue from herbicide application. Has there been a financial assessment to control noxious weeds and ability of the CNF to restore these sites?

The Lands Council is in support of closing the LeClerc grazing allotment to improve critical bull trout habitat along LeClerc Creek and we have worked collaboratively with CNF to restore stretches of the West Branch. How will the land exchange effect the process to close this grazing allotment?

Thank you for the opportunity to comment,

Adam D Gebauer

Public Lands Program Director

The Lands Council